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15 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
16 and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J.
PARDINI IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THEIR
OPPOSITION TO WAYMO'S
SUPPLEMENTAL BRIEF IN
SUPPORT OF WAYMO'S MOTION *IN*
LIMINE NO. 4**

I, Thomas J. Pardini, declare as follows:

1. I am a member of the Bar of the State of California and an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File under Seal Their Opposition to Waymo's Supplemental Brief in Support of Waymo's Motion *In Limine* No. 4.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition to Waymo's Supplemental Brief in Support of Waymo's Motion <i>In Limine</i> No. 4 ("Opposition")	Highlighted Portions	Plaintiff (Green)
Exhibit 1	Highlighted Portions	Plaintiff (Green)
Exhibit 4	Entire Document	Defendants (Blue-Highlighted Portions) Plaintiff (Entire Document)
Exhibit 6	Entire Document	Plaintiff

3. The blue-highlighted portions of Exhibit 4 contain highly confidential information regarding the technical details of Uber's LiDAR systems. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into the technical components of Uber's LiDAR sensors, such that Uber's competitive standing could be significantly harmed.

4. The green-highlighted portions of the Opposition and Exhibit 1, as well as the entireties of Exhibits 4 and 6, contain information that has been designated "Highly Confidential – Attorneys' Eyes Only" or "Confidential" by Waymo in accordance with the Patent

1 Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have
2 agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material
3 under seal in accordance with Paragraph 14.4 of the Protective Order.

4 5. Defendants’ request to seal is narrowly tailored to the portions of their Opposition
5 and attached exhibits that merit sealing.

6 I declare under penalty of perjury that the foregoing is true and correct. Executed this
7 25th day of October, 2017 at San Francisco, California.

8
9 /s/ Thomas J. Pardini
Thomas J. Pardini

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11
12 **ATTESTATION OF E-FILED SIGNATURE**

13 I, Arturo J. González, am the ECF User whose ID and password are being used to file this
14 Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Thomas J. Pardini has
15 concurred in this filing.
16

17 Dated: October 25, 2017

/s/ Arturo J. González
ARTURO J. GONZÁLEZ